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DEPUTY

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 January 2007 Grand Jury **08 CR 1332 JAH**

11 UNITED STATES OF AMERICA, ) Criminal Case No. \_\_\_\_\_  
12 Plaintiff, ) I N D I C T M E N T  
13 v. ) Title 18, U.S.C., Sec. 371;  
14 RAUL VILLARREAL (1), ) Title 8, U.S.C.,  
15 FIDEL VILLARREAL (2), ) Sec. 1324(a)(2)(B)(ii) -  
16 CLAUDIA GONZALEZ (3), ) Conspiracy to Bring in Illegal  
ARMANDO GARCIA (4), ) Aliens for Financial Gain;  
17 Defendants. ) Title 8, U.S.C.,  
18 ) Sec. 1324(a)(2)(B)(ii) - Bringing  
19 ) in Illegal Aliens for Financial  
20 ) Gain; Title 18, U.S.C.,  
21 ) Secs. 201(b)(2)(A) and (C) -  
22 ) Receiving Bribe by Public  
23 ) Official; Title 18, U.S.C.,  
24 ) Sec. 201(b)(1) - Bribery of a  
25 ) Public Official; Title 18, U.S.C.,  
26 ) Secs. 1956(a)(2)(A) and (h) -  
27 ) Conspiracy To Launder Money;  
28 ) Title 18, U.S.C.,  
TFS:nlv:San Diego  
4/24/08  
\_\_\_\_\_  
Title 18, U.S.C.,  
Sec. 1512(a)(2)(A), 1512(b)(1),  
and 1512(k) - Conspiracy to Tamper  
with a Witness; Title 18, U.S.C.,  
Sec. 1512(a)(2)(A) - Witness  
Tampering; Title 18, U.S.C.,  
Sec. 1512(b)(1) - Witness  
Tampering; Title 18, U.S.C.,  
Sec. 2 - Aiding and Abetting;  
Title 18, U.S.C.,  
Secs. 981(a)(1)(C), 982(a)(1), and  
(a)(6); and Title 28, U.S.C.,  
Sec. 2461 - Criminal Forfeiture

apd

The grand jury charges:

### INTRODUCTORY ALLEGATIONS

At various times pertinent to this indictment:

4       1. Defendant FIDEL VILLARREAL was employed by United States  
5 Customs and Border Protection as a Senior Border Patrol Agent assigned  
6 to the Brown Field Border Patrol Station and was responsible for  
7 enforcing United States immigration laws.

8       2. Defendant RAUL VILLARREAL was employed by United States  
9 Customs and Border Protection as a Senior Border Patrol Agent  
10 assigned to the Imperial Beach Border Patrol Station and was  
11 responsible for enforcing United States immigration laws.

### Count 1

Conspiracy to Bring in Illegal Aliens for Financial Gain

[18 U.S.C. § 371 and 8 U.S.C. § 1324(a)(2)(B)(ii)]

15 Beginning on a date unknown to the grand jury and continuing up  
16 to and including 2007, within the Southern District of California, and  
17 elsewhere, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
18 GARCIA, CLAUDIA GONZALEZ, Hector Cabrera (charged elsewhere), Anailde  
19 Trotman (charged elsewhere), and others, did knowingly conspire with  
20 each other and others to commit offenses against the United States  
21 that is, to bring illegal aliens to the United States for the purpose  
22 of commercial advantage and private financial gain; in violation of  
23 Title 8, United States Code, Section 1324(a)(2)(B)(ii).

24 It was the purpose and object of the conspiracy to bring aliens  
25 from Brazil and Mexico illegally into the United States and transport  
26 them without detection by law enforcement officials for the purpose  
27 of personal financial gain and commercial advantage.

28 //

1                   THE MANNER AND MEANS OF THE CONSPIRACY

2                 In furtherance of this conspiracy and to effect the objects  
3 thereof, defendants RAUL VILLARREAL, FIDEL VILLARREAL, ARMANDO GARCIA,  
4 CLAUDIA GONZALEZ, and Hector Cabrera, Anailde Trotman, (both charged  
5 elsewhere), utilized the following manner and means among others:

6                 1. The defendants ran an alien smuggling organization to bring  
7 illegal aliens into the United States from Mexico for money.

8                 2. Defendant CLAUDIA GONZALEZ coordinated with defendants RAUL  
9 VILLARREAL, FIDEL VILLARREAL, ARMANDO GARCIA, Hector Cabrera and  
10 others to lead groups of illegal aliens across the United States-  
11 Mexico border at places other than a designated port of entry where  
12 they were picked up transported to other locations within the United  
13 States in furtherance of their illegal entry.

14                 3. Defendant ARMANDO GARCIA acted as a foot guide and led  
15 illegal aliens into the United States at places other than a  
16 designated port of entry to avoid detection and guided the illegal  
17 aliens to Border Patrol vehicles driven by defendants FIDEL VILLARREAL  
18 and RAUL VILLARREAL near the United States-Mexico border.

19                 4. Defendants CLAUDIA GONZALEZ and ARMANDO GARCIA bribed  
20 defendants RAUL VILLARREAL and FIDEL VILLARREAL not to perform their  
21 duties, that is, enforce the immigration laws of the United States,  
22 but instead to pick up and transport illegal aliens in their official  
23 Border Patrol vehicles to avoid detection by immigration officials.

24                 5. Hector Cabrera recruited, hired, and directed drivers of  
25 vehicles used to transport aliens who illegally entered the United  
26 States.

27                 //

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1       6.    Hector Cabrera collected money representing alien smuggling  
2 proceeds from Anailde Trotman and others, and provided the money to  
3 defendant ARMANDO GARCIA for further distribution among the  
4 coconspirators in Mexico.

5       7. Defendants ARMANDO GARCIA collected money representing alien  
6 smuggling proceeds from Hector Cabrera within the United States and  
7 transported the money to defendant CLAUDIA GONZALEZ in Mexico for  
8 further distribution among RAUL VILLARREAL, FIDEL VILLARREAL, and  
9 other coconspirators.

10       8. Anailde Trotman arranged with aliens from Brazil to smuggle  
11 them into the United States for money and coordinated with Hector  
12 Cabrera and others to smuggle the aliens into the United States and  
13 transport them.

### OVERT ACTS

15 In furtherance of the conspiracy and to effect the objects  
16 thereof, the following overt acts, among others were committed within  
17 the Southern District of California, and elsewhere:

22       2. On May 31, 2005, defendant RAUL VILLARREAL picked up  
23              illegal aliens in his official Border Patrol vehicle,  
24              transported the aliens to a remote location to avoid  
25              detection by immigration officials, and released them in  
26              furtherance of their illegal entry.

1 transported them to a remote location to avoid detection by  
2 immigration officials, and released them in furtherance of  
3 their illegal entry.

- 4 4. On or about October 30, 2005, defendant ARMANDO GARCIA led  
5 a group of illegal aliens into the United States by walking  
6 across the border at a place other than a designated port  
7 of entry.
- 8 5. On or about October 30, 2005, defendant ARMANDO GARCIA led  
9 a group of illegal aliens into an official Border Patrol  
10 vehicle driven by defendant FIDEL VILLARREAL.
- 11 6. On or about October 30, 2005, defendant FIDEL VILLARREAL  
12 picked up and transported defendant ARMANDO GARCIA and a  
13 group of illegal aliens in his official Border Patrol  
14 vehicle to avoid detection by immigration officials, and  
15 released them in furtherance of their illegal entry.
- 16 7. On or about December 2, 2005, defendant ARMANDO GARCIA led  
17 a group of illegal aliens into the United States by walking  
18 across the border at a place other than a designated port  
19 of entry.
- 20 8. On or about December 2, 2005, defendant ARMANDO GARCIA led  
21 the group of illegal aliens into an official Border Patrol  
22 vehicle driven by defendant FIDEL VILLARREAL.
- 23 9. On or about December 2, 2005, defendant FIDEL VILLARREAL  
24 picked up and transported defendant ARMANDO GARCIA and a  
25 group of illegal aliens in his official Border Patrol  
26 vehicle to avoid detection by immigration officers, and  
27 released them in furtherance of their illegal entry.

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- 1       10. On or about January 21, 2006, defendant ARMANDO GARCIA led
- 2              a group of illegal aliens into the United States by walking
- 3              across the border at a place other than a designated port
- 4              of entry.
- 5       11. On or about January 21, 2006, defendant ARMANDO GARCIA led
- 6              a group of illegal aliens into an official Border Patrol
- 7              vehicle driven by defendant FIDEL VILLARREAL.
- 8       12. On or about January 21, 2006, defendant FIDEL VILLARREAL
- 9              picked up and transported defendant ARMANDO GARCIA and a
- 10             group of illegal aliens in his official Border Patrol
- 11             vehicle to avoid detection by immigration officials, and
- 12             released them in furtherance of their illegal entry.
- 13       13. On or about April 9, 2006, defendant ARMANDO GARCIA led a
- 14              group of illegal aliens into the United States by walking
- 15              across the border at a place other than a designated port
- 16              of entry.
- 17       14. On or about April 9, 2006, defendant ARMANDO GARCIA led the
- 18              group of illegal aliens to a remote location and into an
- 19              official Border Patrol vehicle driven by defendant FIDEL
- 20              VILLARREAL.
- 21       15. On or about April 9, 2006, defendant FIDEL VILLARREAL
- 22              picked up illegal aliens in an official Border Patrol
- 23              vehicle to avoid detection by immigration officials, and
- 24              released them in furtherance of their illegal entry.
- 25       16. During 2005, defendant RAUL VILLARREAL made cash deposits
- 26              totaling approximately \$27,896 into his bank account in the
- 27              United States.

28       //

4 All in violation Title 18, United States Code, Section 371.

## Count 2

## Bringing in Illegal Aliens for Financial Gain

[8 U.S.C. § 1324(a)(2)(B)(ii)]

8 On or about June 12, 2005 within the Southern District of  
9 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
10 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
11 immigration laws of the United States, knowing and in reckless  
12 disregard that an alien, namely Alex Cardoso-Miranda, had not received  
13 prior official authorization to come to, enter and reside in the  
14 United States, did bring to the United States said alien for the  
15 purpose of commercial advantage and private financial gain; in  
16 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
17 Title 18, United States Code, Section 2, and Pinkerton v. United  
18 States, 328 U.S. 640 (1946).

Count 3

## Bringing in Illegal Aliens for Financial Gain

[8 U.S.C. § 1324(a)(2)(B)(ii)]

22 On or about October 30, 2005 within the Southern District of  
23 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
24 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
25 immigration laws of the United States, knowing and in reckless  
26 disregard that an alien, namely Andrea Vaz-deAlmeida, had not received  
27 prior official authorization to come to, enter and reside in the  
28 United States, did bring to the United States said alien for the

1 purpose of commercial advantage and private financial gain; in  
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
3 and Title 18, United States Code, Section 2, and Pinkerton v. United  
4 States, 328 U.S. 640 (1946).

5 Count 4

6 Bringing in Illegal Aliens for Financial Gain

7 [8 U.S.C. § 1324(a)(2)(B)(ii)]

8 On or about October 30, 2005 within the Southern District of  
9 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
10 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
11 immigration laws of the United States, knowing and in reckless  
12 disregard that an alien, namely Juliana Tele-Teofilo, had not received  
13 prior official authorization to come to, enter and reside in the  
14 United States, did bring to the United States said alien for the  
15 purpose of commercial advantage and private financial gain; in  
16 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
17 and Title 18, United States Code, Section 2, and Pinkerton v. United  
18 States, 328 U.S. 640 (1946).

19 Count 5

20 Bringing in Illegal Aliens for Financial Gain

21 [8 U.S.C. § 1324(a)(2)(B)(ii)]

22 On or about October 30, 2005 within the Southern District of  
23 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
24 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
25 immigration laws of the United States, knowing and in reckless  
26 disregard that an alien, namely Floraci Candida-daSilva, had not  
27 received prior official authorization to come to, enter and reside in  
28 the United States, did bring to the United States said alien for the

1 purpose of commercial advantage and private financial gain; in  
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
3 and Title 18, United States Code, Section 2, and Pinkerton v. United  
4 States, 328 U.S. 640 (1946).

5 Count 6

6 Bringing in Illegal Aliens for Financial Gain

7 [8 U.S.C. § 1324(a)(2)(B)(ii)]

8 On or about December 2, 2005 within the Southern District of  
9 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
10 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
11 immigration laws of the United States, knowing and in reckless  
12 disregard that an alien, namely Danilo Carvalho-Silva, had not  
13 received prior official authorization to come to, enter and reside in  
14 the United States, did bring to the United States said alien for the  
15 purpose of commercial advantage and private financial gain; in  
16 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
17 Title 18, United States Code, Section 2, and Pinkerton v. United  
18 States, 328 U.S. 640 (1946).

19 Count 7

20 Bringing in Illegal Aliens for Financial Gain

21 [8 U.S.C. § 1324(a)(2)(B)(ii)]

22 On or about December 2, 2005 within the Southern District of  
23 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
24 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
25 immigration laws of the United States, knowing and in reckless  
26 disregard that an alien, namely Fabio Dos Santos, had not received  
27 prior official authorization to come to, enter and reside in the  
28 United States, did bring to the United States said alien for the

1 purpose of commercial advantage and private financial gain; in  
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
3 and Title 18, United States Code, Section 2, and Pinkerton v. United  
4 States, 328 U.S. 640 (1946).

5 Count 8

6 Bringing in Illegal Aliens for Financial Gain

7 [8 U.S.C. § 1324(a)(2)(B)(ii)]

8 On or about December 2, 2005 within the Southern District of  
9 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
10 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
11 immigration laws of the United States, knowing and in reckless  
12 disregard that an alien, namely Paula Dos Reis, had not received prior  
13 official authorization to come to, enter and reside in the United  
14 States, did bring to the United States said alien for the purpose of  
15 commercial advantage and private financial gain; in violation of  
16 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
17 United States Code, Section 2, and Pinkerton v. United States,  
18 328 U.S. 640 (1946).  
19

20 Count 9

21 Bringing in Illegal Aliens for Financial Gain

22 [8 U.S.C. § 1324(a)(2)(B)(ii)]

23 On or about December 2, 2005 within the Southern District of  
24 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
25 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
26 immigration laws of the United States, knowing and in reckless  
27 disregard that an alien, namely Jose Marcelino, had not received prior  
28 official authorization to come to, enter and reside in the United  
States, did bring to the United States said alien for the purpose of

1 commercial advantage and private financial gain; in violation of  
2 Title 8, United States Code, Section 1324(a)(2)(B)(ii), and Title 18,  
3 United States Code, Section 2, and Pinkerton v. United States,  
4 328 U.S. 640 (1946).

5 Count 10

6 Bringing in Illegal Aliens for Financial Gain

7 [8 U.S.C. § 1324(a)(2)(B)(ii)]

8 On or about January 21, 2006, within the Southern District of  
9 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
10 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
11 immigration laws of the United States, knowing and in reckless  
12 disregard that an alien, namely Hugo Pliego-Pliego, had not received  
13 prior official authorization to come to, enter and reside in the  
14 United States, did bring to the United States said alien for the  
15 purpose of commercial advantage and private financial gain; in  
16 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
17 and Title 18, United States Code, Section 2, and Pinkerton v. United  
18 States, 328 U.S. 640 (1946).

19 Count 11

20 Bringing in Illegal Aliens for Financial Gain

21 [8 U.S.C. § 1324(a)(2)(B)(ii)]

22 On or about January 21, 2006, within the Southern District of  
23 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
24 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
25 immigration laws of the United States, knowing and in reckless  
26 disregard that an alien, namely Jose Vaca-Ayala, had not received  
27 prior official authorization to come to, enter and reside in the  
28 United States, did bring to the United States said alien for the

1 purpose of commercial advantage and private financial gain; in  
2 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
3 and Title 18, United States Code, Section 2, and Pinkerton v. United  
4 States, 328 U.S. 640 (1946).

5 Count 12

6 Bringing in Illegal Aliens for Financial Gain

7 [8 U.S.C. § 1324(a)(2)(B)(ii)]

8 On or about January 21, 2006, within the Southern District of  
9 California, defendants FIDEL VILLARREAL, RAUL VILLARREAL, ARMANDO  
10 GARCIA, and CLAUDIA GONZALEZ, with the intent to violate the  
11 immigration laws of the United States, knowing and in reckless  
12 disregard that an alien, namely Alejandro Romero-Garcia, had not  
13 received prior official authorization to come to, enter and reside in  
14 the United States, did bring to the United States said alien for the  
15 purpose of commercial advantage and private financial gain; in  
16 violation of Title 8, United States Code, Section 1324(a)(2)(B)(ii),  
17 and Title 18, United States Code, Section 2, and Pinkerton v. United  
18 States, 328 U.S. 640 (1946).

19 Count 13

20 Receiving Bribe by Public Official

21 [18 U.S.C. § 201(b)(2)(A) and (C)]

22 Between a date unknown and up to and including June 26, 2006,  
23 within the Southern District of California, and elsewhere, defendants  
24 FIDEL VILLARREAL and RAUL VILLARREAL, then public officials, that is  
25 United States Border Patrol Agents, did directly and indirectly  
26 corruptly demand, seek, receive, accept, and agree to receive  
27 something of value personally, that is United States currency, in  
28 return for being influenced in the performance of an official act and

1 being inducted to do and omit to do an act in violation of defendants'  
2 official duties, that is failing to enforce the immigration laws of  
3 the United States, by aiding and abetting the bringing in of illegal  
4 aliens, and transporting illegal aliens; all in violation of Title 18,  
5 United States Code, Sections 201(b)(2)(A), (C), and 2.

6    Count 14

7    Bribery of a Public Official

8    [18 U.S.C. § 201(b)(1)(A) and (C)]

9    Between a date unknown and up to and including June 26, 2006,  
10 within the Southern District of California, and elsewhere, defendants  
11 ARMANDO GARCIA and CLAUDIA GONZALEZ did directly and indirectly  
12 corruptly offer, promise to give and give something of value  
13 personally, that is United States currency, to FIDEL VILLARREAL and  
14 RAUL VILLARREAL, then public officials, that is, United States Border  
15 Patrol Agents, to influence the public officials to do and omit to do  
16 an act in violation of their official duties, that is failing to  
17 enforce the immigration laws of the United States, by aiding and  
18 abetting the bringing in of illegal aliens, and transporting illegal  
19 aliens; all in violation of Title 18, United States Code,  
20 Sections 201(b)(1)(A), (C), and 2.

21    Count 15

22    CONSPIRACY TO LAUNDER MONEY (INTERNATIONAL PROMOTION)

23    [18 U.S.C. §§ 1956(a)(2)(A) and (h)]

24    1. The Introductory Allegations and the Manner and Means in  
25 Count 1 are hereby re-alleged and restated.

26    2. Beginning on a date unknown to the grand jury and continuing  
27 up to the date of this Indictment, within the Southern District of  
28 California, and elsewhere, defendants RAUL VILLARREAL, FIDEL

1 VILLARREAL, CLAUDIA GONZALEZ, ARMANDO GARCIA, and others did knowingly  
2 conspire with others known and unknown to the grand jury to knowingly  
3 transmit and transfer monetary instruments and funds from a place in  
4 the United States to a place outside thereof, to wit, Mexico,  
5 affecting foreign commerce, with the intent to promote the carrying  
6 on of specified unlawful activity, to wit, alien smuggling in  
7 violation of Title 18, United States Code, Section 1956(a)(2)(A).  
8 All in violation of Title 18, United States Code, Section 1956(h).

9    Count 16

10    CONSPIRACY TO TAMPER WITH A WITNESS

11    [18 U.S.C. §§ 1512(a)(2)(A), (b)(1), and (k)]

12         1. The Introductory Allegations and the Manner and Means in  
13 Count 1 are hereby re-alleged and restated.

14         2. Beginning on a date unknown to the grand jury and continuing  
15 up to the date of this Indictment, within the Southern District of  
16 California, and elsewhere, defendants FIDEL VILLARREAL, RAUL  
17 VILLARREAL, ARMANDO GARCIA, and CLAUDIA GONZLAEZ did intentionally and  
18 knowingly conspire with others known and unknown to the grand jury to  
19 use the threat of physical force and to knowingly use intimidation and  
20 threaten another person with the intent to influence, delay, and  
21 prevent the testimony of another person, that is, Hector Cabrera, in  
22 an official proceeding within the Southern District of California; in  
23 violation of Title 18, United States Code, Sections 1512(a)(2)(A),  
24 (b)(1), and (k).

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Count 17

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WITNESS TAMPERING

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[18 U.S.C. § 1512(a)(2)(A)]

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During late September 2007, within the Southern District of California, and elsewhere, defendants CLAUDIA GONZALEZ, FIDEL VILLARREAL, RAUL VILLARREAL, and ARMANDO GARCIA, did use the threat of physical force with the intent to influence, delay, and prevent the testimony of another person, that is, Hector Cabrera, in an official proceeding within the Southern District of California; in violation of Title 18, United States Code, Sections 1512(a)(2)(A), and 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

11

12

Count 18

13

WITNESS TAMPERING

14

[18 U.S.C. § 1512(b)(1)]

15

During late March 2008, within the Southern District of California, and elsewhere, defendants CLAUDIA GONZALEZ, FIDEL VILLARREAL, RAUL VILLARREAL, and ARMANDO GARCIA, did knowingly use intimidation and threaten another person, that is, Maria Irene Flores, with the intent to influence, delay, and prevent the testimony of another person, that is, her son, Hector Cabrera, in an official proceeding within the Southern District of California; in violation of Title 18, United States Code, Sections 1512(b)(1), 2, and Pinkerton v. United States, 328 U.S. 640 (1946).

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CRIMINAL FORFEITUREMONEY LAUNDERING

- 1        3.     The allegations contained in Count 15 are realleged and by  
2        4     their reference fully reincorporated herein for the purpose  
3        5     of alleging forfeiture to the United States of America  
4        6     pursuant to the provisions of Title 18, United States Code,  
5        7     Section 1956, and Title 18, United States Code,  
6        8     Section 982(a)(1).
- 9        2.     As a result of the commission of the felony money  
10      11    laundering offense alleged in Count 15 of this Indictment,  
11      12    said violation being punishable by imprisonment for more  
12      13    than one year and pursuant to Title 18, United States Code,  
13      14    Sections 1956(a)(2)(A) and (h), and Title 18, United States  
14      15    Code, Section 982(a)(6), defendants RAUL VILLARREAL, FIDEL  
15      16    VILLARREAL, CLAUDIA GONZALEZ, and ARMANDO GARCIA shall,  
16      17    upon conviction, forfeit to the United States all their  
17      18    rights, title and interest in the following: (a) any  
18      19    conveyance, including any vessel, vehicle, or aircraft used  
19      20    in the commission of the offense of which defendants are  
20      21    charged; (b) any property real or personal, that  
21      22    constitutes, or is derived from or is traceable to the  
22      23    proceeds obtained directly or indirectly from the  
23      24    commission of the offense of which the defendants are  
24      25    charged; (c) any property real or personal, that is used to  
25      26    facilitate, and is intended to be used to facilitate, the  
26      27    commission of the offenses of which the defendants are  
27      28    charged.

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1       3. If any of the above-described forfeitable property, as a  
2           result of any action or omission of the defendant -  
3           (a) cannot be located upon the exercise of due diligence;  
4           (b) has been transferred or sold to, or deposited with, a  
5           third party;  
6           (c) has been placed beyond the jurisdiction of the Court;  
7           (d) has been substantially diminished in value; or  
8           (e) has been commingled with other property which cannot  
9           be subdivided without difficulty;  
10      it is the intent of the United States, pursuant to Title 18, United  
11     States Code, Section 982(b), to seek forfeiture of any other property  
12     of the defendants up to the value of said property listed above as  
13     being subject to forfeiture; all in violation of Title 18, United  
14     States Code, Sections 982(a)(1) and 1956.

15     BRINGING IN ILLEGAL ALIENS

16     1. The allegations contained in Counts 1 through 12,  
17       inclusive, are realleged and by their reference fully  
18       reincorporated herein for the purpose of alleging  
19       forfeiture to the United States of America pursuant to the  
20       provisions of Title 8, United States Code, Section 1324(a),  
21       and Title 18, United States Code, Section 982(a)(6).  
22     2. As a result of the commission of the felony offenses  
23       alleged in Counts 1 through 12 of this Indictment, said  
24       violations being punishable by imprisonment for more than  
25       one year and pursuant to Title 8, United States Code,  
26       Section 1324(a), and Title 18, United States Code,  
27       Section 982(a)(6), defendants RAUL VILLARREAL and FIDEL  
28       VILLARREAL, CLAUDIA GONZALEZ, and ARMANDO GARCIA shall,

1           upon conviction, forfeit to the United States all their  
2           rights, title and interest in the following: (a) any  
3           conveyance, including any vessel, vehicle, or aircraft used  
4           in the commission of the offense of which defendants are  
5           charged; (b) any property real or personal, that  
6           constitutes, or is derived from or is traceable to the  
7           proceeds obtained directly or indirectly from the  
8           commission of the offense of which the defendants are  
9           charged; (c) any property real or personal, that is used to  
10          facilitate, and is intended to be used to facilitate, the  
11          commission of the offenses of which the defendants are  
12          charged.

13         3. If any of the above-described forfeitable property, as a  
14          result of any action or omission of the defendant -  
15           (a) cannot be located upon the exercise of due diligence;  
16           (b) has been transferred or sold to, or deposited with, a  
17           third party;  
18           (c) has been placed beyond the jurisdiction of the Court;  
19           (d) has been substantially diminished in value; or  
20           (e) has been commingled with other property which cannot  
21           be subdivided without difficulty;  
22         it is the intent of the United States, pursuant to Title 18, United  
23         States Code, Section 982(b), to seek forfeiture of any other property  
24         of the defendants up to the value of said property listed above as  
25         being subject to forfeiture; all in violation of Title 18, United  
26         States Code, Section 982(a)(6), and Title 8, United States Code,  
27         Section 1324.

28         //

1     BRIBERY

- 2     1. The allegations contained in Count 13 are realleged and by  
3         their reference fully reincorporated herein for the purpose  
4         of alleging forfeiture to the United States of America  
5         pursuant to the provisions of Title 18, United States Code,  
6         Sections 201 and 981(a)(1)(C), and Title 28, United States  
7         Code, Section 2461.
- 8     2. As a result of the commission of the offense alleged in  
9         Count 13 of this Indictment, involving receiving bribes by  
10        a public official in violation of Title 18, United States  
11        Code, Sections 201(b)(2)(A) and (C), defendants RAUL  
12        VILLARREAL and FIDEL VILLARREAL shall, upon conviction,  
13        forfeit to the United States, pursuant to Title 18, United  
14        States Code, Section 981(a)(1)(C), and Title 28, United  
15        States Code, Section 2461, any property, real or personal,  
16        which constitutes or is derived from proceeds traceable to  
17        those offenses.
- 18     3. If any of the above-described forfeitable property, as a  
19        result of any action or omission of the defendant -  
20           (a) cannot be located upon the exercise of due diligence;  
21           (b) has been transferred or sold to, or deposited with, a  
22           third party;  
23           (c) has been placed beyond the jurisdiction of the Court;  
24           (d) has been substantially diminished in value; or  
25           (e) has been commingled with other property which cannot  
26           be subdivided without difficulty;

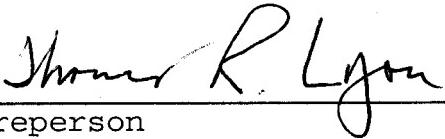
27     //

28     //

1 it is the intent of the United States, pursuant to Title 18, United  
2 States Code, Section 982(b), to seek forfeiture of any other property  
3 of the defendants up to the value of said property listed above as  
4 being subject to forfeiture; all pursuant to Title 18, United States  
5 Code, Section 981(a)(1)(C), and Title 28, United States Code,  
6 Section 2461.

7 DATED: April 24, 2008.

8 A TRUE BILL:

9  
10   
11  
12 Foreperson

13  
14 KAREN P. HEWITT  
15 United States Attorney

16  
17 By:   
18 TIMOTHY F. SALEL  
19 Assistant U.S. Attorney

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